

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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May 11, 2004

SENT BY E-Mail, and
First Class U.S. Mail

Patricia French, Esq.
Bay State Gas Company
300 Friberg Parkway
Westborough, MA 01581-5039

Re: Bay State Gas Company, D.T.E. 04-12

Dear Ms. French:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to Bay State Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., May 25, 2004.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Service List
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUEST OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BAY STATE GAS COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Bay State Gas Company ("Bay State" or "Company") the following information request(s) with respect to the March 1, 2004 Service Quality ("SQ") Report, ("Filing") D.T.E. 04-12.

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills,

checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer.

Requests

- DTE 1-1 Refer to the Company's Filing, Section Three, at 8. The Company states that the 2003 SQ Report includes results from two surveys: Residential Customer Survey and Service Contact Survey. Please provide copies of the two consumer satisfaction surveys conducted by the third party vendor. Include the research methodology and other survey instruments used in conducting the surveys.
- DTE 1-2 Refer to the Company's Filing, Section Two at 3. The Company states that it includes current and ten-year historical data regarding Unaccounted-for-Gas. Please explain why the percentages for the following years are negative: 2002; 2001; 1999; 1998; and 1996.
- DTE 1-3 Please explain how each of the following SQ indices was recorded and measured. In your response, indicate if the Company faced any recording and measurement issues and how they were resolved. Provide documentation to support your answer.
- (a) Telephone Answering Factor
 - (b) Emergency Answering
 - (c) Service Appointments Kept
 - (d) Meter Reads
 - (e) Bill Adjustments
 - (f) Lost Time Accident Rate
 - (g) Response to Odor Calls
 - (h) Restricted Work Day Rate
 - (I) Unaccounted for Gas
 - (j) Restricted Work Day Rate
- DTE 1-4 Please detail the internal audits that have been conducted to assure the accuracy of Company data. If internal audits have not been performed, explain whether the Company plans to perform such audits.
- DTE 1-5 Refer to the Company's Filing, Section Three at 3, regarding On-Cycle Meter Reads, please confirm and verify the following figures: "total meters to be read for the year 2003"; "total actual reads for the year 2003"; and "period percent for the year 2003."
- DTE 1-6 For each of the SQ penalty measures, please detail the initiatives the Company has implemented during 2003 to improve its performance.

- DTE 1-7 For each of the SQ penalty measures, please detail any conditions under which the Company operated during 2003 that may have influenced the results the Company achieved.
- DTE 1-8 Refer to the Company's Filing, Section Two at 2, regarding Capital Spending History. Please:
- (a) Confirm how the means of "Capital Investment Completed" and "Capital Investment Related to system Maintenance Completed" were calculated. Verify the means provided to the Department.
 - (b) Compute the percentage of the 2003 Capital Investment Completed over the 10-year average Capital Investment Completed.
 - (c) Compute the percentage of the 2003 Capital Investment Related to System Maintenance Completed over the 10-year average Capital Investment Related to System Maintenance Completed.
 - (d) The year 2003 exhibits the lowest level of Capital Investment Completed by the Company in the last 11 years. Discuss the reason(s).
- DTE 1-9 Refer to the Company's Filing, Section Two at 4, regarding Staffing Levels. Please recalculate the mean taking into account the period 1993-2002.
- DTE 1-10 Please provide electronic versions of all responses, including calculations and worksheets together with your responses.
- DTE 1-11 Please explain how the Company calculates the number of responses to Odor Calls. Specifically, if the Company receives more than one call regarding the same odor source, does the Company count this as one call or as multiple calls?